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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 NATHALIE SANTOS, an individual,

Case No.: 2:20-cv-02053-JCM-VCF

11 Plaintiff,

12 vs.

13 DISCOVER FINANCIAL SERVICES  
14 LLC, a foreign limited-liability company;  
EQUIFAX INFORMATION SERVICES,  
15 LLC, a foreign limited-liability company;  
EXPERIAN INFORMATION  
16 SOLUTIONS, INC., a foreign corporation,

**DISCOVER FINANCIAL  
SERVICES, LLC'S UNOPPOSED  
MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
COMPLAINT**

**(THIRD REQUEST)**

17 Defendant.

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19 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Discover Financial Services,  
20 LLC ("Discover"), through its attorneys, respectfully requests that the Court extend the  
21 deadline in which Discover has to answer or otherwise plead to Plaintiff's Complaint, by 7  
22 days, through and until February 16, 2021. In support of its Motion, Discover states as  
23 follows:

- 24 1. Plaintiff's Complaint was filed on November 6, 2020. ECF No. 1
- 25 2. After executing a waiver of service, Discover's deadline to respond to the  
26 Plaintiff's Complaint was January 11, 2021.
- 27 3. Discover previously moved to extend its deadline by 14 days, through  
28 January 25, 2021 ("First Request"), which was granted by the Court in order for Discover

1 to review documentation and investigate the allegations in the Plaintiff's Complaint. ECF  
2 No. 16.

3 4. Discover further moved to extend its deadline by an additional 14 days,  
4 through and until February 8, 2021, to allow Discover to prepare a declaration in support of  
5 its request from Plaintiff for a dismissal ("Second Request"), which the Court granted. ECF  
6 No. 21.

7 5. Discover now respectfully requests that the Court extend Discover's current  
8 deadline of February 8, 2021, to respond to the Complaint by 7 days through and including  
9 February 16, 2021,<sup>1</sup> to allow the parties to finalize the terms of resolution ("Third Request").

10 6. Discover's Third Request is brought in good faith and not made to  
11 unnecessarily delay discovery or the proceedings in this matter. The parties anticipate a  
12 resolution of this matter and seek additional time to finalize documentation.

13 7. No party will be prejudiced by this Third Request for extension nor,  
14 respectfully, will the extension unduly burden the Court.

15 8. Counsel for Discover sought concurrence to this motion from counsel for  
16 Plaintiff and concurrence was obtained to extend the deadline to February 16, 2021.  
17 Counsel for Plaintiff has agreed to extend the response deadline by 7 days.

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<sup>1</sup> Of note, February 15, 2021, is a holiday.

**Lewis Roca**  
ROTHGERBER CHRISTIE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of February, 2021, I caused a true and accurate copy of the foregoing document entitled *Discover Financial Services, LLC's Unopposed Motion to Extend Deadline to Respond to Complaint* to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Annette Jaramillo

An employee of Lewis Roca  
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